



FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL

August 14, 2008

2008 AUG 18 A 9 59

Office of the General Counsel
ATTN: Michael A Columbo
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Mr. Columbo:

MUR 5993

I am in receipt of your letter, dated July 28, 2008, which Bachmann for Congress ("BFC") received on August 1, 2008. Thank you for providing BFC the opportunity to provide relevant factual or legal materials relevant to the contributions cited in your letter.

The MN-06 Congressional Victory Committee (FEC ID# C00421636) ("Victory") was established as a Joint Fundraising Committee on April 10, 2006, affiliated with MIDWEST ROMP (FEC ID# C00422196). In an amended Form 1, Victory affiliated with 2006 JOINT CANDIDATE COMMITTEE (FEC ID# C00423590) on May 5, 2006. In a second amended Form 1, Victory affiliated with BFC on October 17, 2006.

Victory's transfer of \$134,000 to BFC (\$115,000 on October 18, 2006 and \$19,000 on November 6, 2006) were made, not as a contribution, but an allocation of proceeds from the joint fundraising activity. As such, the transactions you reference are not subject to the applicable contribution limits (\$2,100) under the Federal Election Campaign Act of 1971, as amended ("the Act").

Additionally, please note that the Commission inquired twice by letter to Victory about its status as a Joint Fundraising Committee and its affiliation with BFC--once on November 8, 2006, and again on April 20, 2007. Victory responded on both occasions (December 6, 2006, and May 20, 2007) informing the Commission that Victory was affiliated with BFC. In its second response, Victory also noted that it was set up and operated consistent with the Commission's Advisory Opinion 1977-16.

Thank you again for your inquiry. We hope this information will lead you to recommend against opening a Matter Under Review. If you have any questions, please feel free to contact me

Sincerely,

Jonathan F. Graham
Treasurer